



**James W. Boyan III**

Member of the Firm

jboyan@pashmanstein.com

Direct: 201.270.4935

October 7, 2021

**VIA ECF**

Hon. Jessica S. Allen, U.S.M.J.

United States District Court for the District of New Jersey

Martin Luther King Building & U.S. Courthouse

50 Walnut Street

Newark, NJ 07102

Re: *Dorsainvil v. Peim, et al.*

Civil Action No. 15-3035

Dear Judge Allen:

This firm represents Plaintiff Wedpens Dorsainvil in the above-referenced matter. The current deadline for Plaintiff to serve his affirmative expert report in this matter is October 8, 2021. To date, we have been unable to find an expert for this matter. We write to respectfully request a 30-day extension of the deadlines for expert discovery so that we may have more time to attempt to find an expert. Defendants' counsel consents to this request.

If this request is granted, then affirmative expert reports would be due by **November 8, 2021**, responsive reports would be due by **December 8, 2021**, and the deadline for the completion of all expert discovery, including expert depositions, would be **January 10, 2022**.

Thank you for Your Honor's courtesies and consideration of this request.

Respectfully submitted,

/s/ James W. Boyan III

JAMES W. BOYAN III

cc: Candice Rienzo, Esq. (Counsel for Defendants)

**So Ordered.**

The November 15, 2021 Telephone Status Conference will proceed as scheduled.

s/ Jessica S. Allen

Hon. Jessica S. Allen, U.S.M.J.

Dated: October 8, 2021